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April 5, 2021

VIA ECF

Hon. Lorna G. Schofield United States District Court Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: US Airways, Inc., for American Airlines, Inc. as Successor and Real Party in Interest v. Sabre Holdings Corp., et al., No. 1:11-cv-02725-LGS

Joint Status Letter

Dear Judge Schofield:

We write to provide a status update pursuant to the Court's Third Amended Case Management Plan (Dkt. No. 991).

Since our February 4 status update (Dkt. No.1006), the parties have done the following:

- On February 23, 2021, US Airways served its new expert reports and related materials on Sabre. Sabre's replies are due on May 24.
- On March 26, 2021, US Airways produced certain categories of data in response to Sabre's December 29, 2020 requests for production and pursuant to the Court's March 23, 2021 order (Dkt. No. 1012). Sabre is currently reviewing that production.
- On April 2, 2021, US Airways renewed its request that Sabre disclose which 2016 trial witnesses will be available to testify in the April 25, 2022 re-trial, and reiterated the need for trial preservation depositions for witnesses who will not be able to appear live. Sabre intends to respond shortly.

At this time, there are no issues requiring judicial intervention. The parties will continue to meet and confer, as needed, and will promptly raise any issues to the Court that we cannot resolve.

Respectfully submitted,

Andrew J. Frackman

of O'MELVENY & MYERS LLP

for US Airways, Inc. for American Airlines, Inc. as

Successor and Real Party in Interest

cc: Counsel for Sabre (via ECF)